

FILED
DISTRICT COURT OF GUAM

NOV - 5 2007

JEANNE G. QUINATA
Clerk of Court

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Attorneys for Plaintiff-Intervenors,
Jennifer Holbrook, Rosemarie
Taimanglo and Vivienne Villanueva

IN THE DISTRICT COURT OF GUAM

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

LEO PALACE RESORT,

Defendant.

CIVIL CASE NO. 06-00028

**DECLARATION OF
JENNIFER T. HOLBROOK**

JENNIFER HOLBROOK,
VIVIENE VILLANUEVA and
ROSEMARIE TAIMANGLO,

Plaintiff-Intervenors,

vs.

MDI GUAM CORPORATION dba LEO
PALACE RESORT MANENGGON HILLS
and DOES 1 through 10,

Defendant.

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ORIGINAL

1 I, JENNIFER T. HOLBROOK, hereby declare as follows:

2 1. I am over the age of eighteen (18) years and one of the Plaintiff-Intervenors in the
3 above-captioned and numbered case.

4 2. As a result of my employment with Leo Palace Resort I sought psychological care
5 from Tom Babauta, MSW, QCSW, beginning in April 2006. Prior to that time I had seen
6 Psychologist Lilli Perez-Iyechad, PhD, RPT-S, for psychological treatment related to my
7 employment at Leo Palace Resort.

8 3. On or about September 14, 2007, the Court Ordered Dr. Perez-Iyechad and Mr.
9 Babauta to deliver all medical records in their possession to the Defendant in this case.

10 4. It has come to my attention that my medical records were not timely produced as
11 required by a Court Order. I, at no time, had any discussion with Dr. Lilli or Counselor Babauta after
12 the Court Order either requesting or demanding that they not produce any records or in any other way
13 violate the Court Order.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Dated at Hagåtña, Guam, on November 2, 2007.

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18 JENNIFER T. HOLBROOK

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